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AUG 12 1993

NEW JERSEY BOARD OF CHIROPRACTIC EXAMINERS

DUGHI AND HEWIT 340 North Avenue Cranford, New Jersey 07016 (908) 272-0200 Attorneys for Respondent, Joseph T. Ruane, D.C.

IN THE MATTER OF THE SUSPENSION OR REVOCATION OF LICENSE OF JOSEPH T. RUANE, D.C. LICENSE NO. 38MC002481 LICENSED TO PRACTICE CHIROPRACTIC IN THE STATE OF NEW JERSEY

DEP'T OF LAW AND PUBLIC SAFETY DIVISION OF CONSUMER AFFAIRS BOARD OF CHIROPRACTIC EXAMINERS

Administrative Action

ANSWER

Dughi and Hewit, P.C., on behalf of respondent, Joseph T. Ruane, D.C., answers the Counts of the Complaint which are directed against respondent. No response is made to any Counts not directed against respondent named herein.

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7.0

FIRST COUNT

- 1. The allegations contained in paragraphs 1, 2 and 3 are admitted.
- 2. The allegations contained in paragraphs 4, 5, 6, 7 and 9 are denied.
- 3. No response is made to the allegations contained in paragraph 8 of this Count as they state a legal conclusion.

SECOND COUNT

- 1. The answers to the allegations contained in the preceding Counts are repeated and reiterated as if the same were set forth at length.
- 2. The allegations contained in paragraphs 4, 5, 6, 7, 8, 9 and 10 are denied.
- 3. No response is made to paragraphs 2 and 3 of this Count as this defendant is presently without knowledge or information sufficient to form a belief as to the truth of these allegations.

THIRD COUNT

- 1. The answers to the allegations contained in the preceding Counts are repeated and reiterated as if the same were set forth at length.
- 2. The allegations contained in paragraph 2 are admitted.
- 3. The allegations contained in paragraphs 3, 4, 5, 6 and 7 are denied.

FOURTH COUNT

1. The answers to the allegations contained in the

preceding Counts are repeated and reiterated as if the same were set forth at length.

- 2. The allegations contained in paragraphs 2 and 3 are admitted.
- 3. The allegations contained in paragraphs 4, 5 and 7 are denied.
- 4. No response is made to paragraph 6 of this Count as this defendant is presently without knowledge or information sufficient to form a belief as to the truth of these allegations.

FIFTH COUNT

- 1. The answers to the allegations contained in the preceding Counts are repeated and reiterated as if the same were set forth at length.
- 2. The allegations contained in paragraphs 2 and 4 are admitted.
- 3. The allegations contained in paragraphs 3, 5, 6, 7 and 8 are denied.

CERTIFICATIONS

We hereby certify that the within Answer was served within the time period allowed by Rule 4:6 or within the extension granted.

We hereby certify pursuant to Rule 4:5-1, to the best of our knowledge, information and belief, that this matter is not the subject of any other action in any court or pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated. To the best of our knowledge at this time, all parties who should have been joined in this action have

been joined.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, the Court is advised that Michael J. Keating is hereby designated as trial counsel.

DUGHI AND HEWIT

Michael J. Keating

Dated: August 7, 1998

CERTIFICATION OF SERVICE AND FILING

I, Genevieve Coon, employed by the law firm of Dughi and Hewit, hereby certify that the original Answer to the Complaint has been forwarded to the Clerk of the Court for filing. I further certify that I forwarded copies of the within Answer by first class mail, or New Jersey Lawyers Service addressed to counsel for the plaintiff.

Genevieve Coon Legal Assistant

Dated: August 7, 1998